



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8**

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June 6, 2007

Ref: Ref: EPR-N

Mr. Chip Sibbernsen
Ogden Ranger District
507 25th Street, Suite 103
Ogden, UT 84401

Re: Ogden Ranger District Travel Plan Revision SDEIS
CEQ#20070145

Dear Mr. Sibbernsen:

The Region 8 Office of the Environmental Protection Agency (EPA) has reviewed the Ogden Ranger District Travel Plan Revision Draft Supplemental Environmental Impact Statement (SDEIS). In accordance with our responsibilities under the National Environmental Policy Act (NEPA), 42 U.S.C. 4371 *et seq.* and the Clean Air Act §309, 42 U.S.C. 7609, EPA offers the following comments for your consideration.

The SDEIS has been issued to address concerns received by the USFS after its issuance of the Ogden Ranger District Travel Plan Revision Final Environmental Impact Statement (FEIS) and Record of Decision (ROD). The SDEIS is focusing on the cumulative effects analysis, which the Forest Supervisor of the Wasatch-Cache National Forest determined was not adequate to support the USFS decision to implement Alternative 5 for the Ogden District Travel Plan.

After our review of the SDEIS, EPA has the following areas of concern on the Ogden Ranger District Travel Plan Revision EIS. These areas of concern are:

Additional information needs for the FEIS:

In reviewing the SDEIS, one issue that should be addressed in more detail in the FEIS is the USFS's ability or limited ability to offset and prevent anthropogenic impacts to the natural environment caused by motorized recreational users within the Ogden Ranger District. These concerns are based on comments received on the DEIS and the USFS's responses to these comments in the DEIS. Our detailed comments are enclosed.

USFS's response to EPA's comments on the DEIS:

Chapter 8 of the FEIS contained responses to comments received during the DEIS comment period. EPA was very concerned with the FEIS's lack of response to our comments on the DEIS. As stated in our FEIS July 18, 2006 letter, "The Final EIS acknowledges that EPA's comments were

received (comment letter # 121, p. 8-69). The response table summarizes EPA's comments using the designation "N/A." After our review of the FEIS, EPA contacted the USFS directly expressing our concern on this lack of response to our comments on the DEIS. We were informed at that time a SDEIS would be issued which would include responses to our comments. In our review of the SDEIS we again find that EPA's concerns have not been addressed. It is because of this lack of response we are requesting a meeting with the USFS to discuss why our comments were not addressed in either the FEIS or SDEIS. We would like to meet with the USFS prior to the issuance of the FEIS and ROD to fully discuss our concerns.

EPA's Rating

EPA has concerns with the potential for effects to both aquatic and terrestrial resources in the project area from the existing and proposed travel systems and from the indirect effects of unauthorized motorized use that originates from the system. We have recommended that additional information be added to fully understand the existing conditions and projected impacts from the proposed actions. EPA has issued a rating of **EC-2 (Environmental Concerns - Needs Information)**. The "EC" rating indicates that the EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures to assure protection of aquatic and terrestrial resources may require changes to the preferred alternative, or application of mitigation measures or actions that can reduce these impacts. The "2" indicates that EPA has identified additional information, data, analyses or discussion that should be included in the Final EIS. A full description of EPA's EIS rating system is enclosed.

If you have any questions regarding these comments, please contact me at (303) 312-6004 or EPA's lead reviewer for this project, Dick Clark at (303) 312-6748.

Sincerely,

/s/ Larry Svoboda, Director
NEPA Program

enclosure

Detailed Comments
Draft Supplemental Environmental Impact Statement
Ogden Ranger District Travel Management Plan Revision

On page SEIS-1 three comments addressed the issues of enforcement and the anticipated increases of motorized use of the forest.

DEIS Commenter: The USFS should provide a better travel map, signage and education program.

SDEIS Response: “An improved travel map and education program is needed regardless of which alternative is selected.”

EPA’s concerns: The FEIS should state how the travel map will be improved over the existing travel map, how the USFS will circulate the travel map and how the education program would be implemented. In addition, the SDEIS did not include a response to the commenter on the issue of “better on-the-ground signing needs.” All three of these needs are critical to addressing the reduction of impacts to the natural environment by motorized recreation travel. They are also important for evaluating the impacts and mitigation needs of the preferred action identified in the FEIS and ROD.

DEIS Commenter: “The USFS is not enforcing the travel plan restrictions on existing roads and trails system because of funding limitations or other problems.”

Response: “A more effective enforcement is needed regardless of which alternative is selected. Enforcement is an administration action, not a NEPA decision.”

EPA’s concern: The FEIS should expand on its response on this critical concern and issue. The public along with EPA, is concerned with the impacts that have occurred within the Ogden Ranger District due to budget restraints and a reduction in enforcement personnel. The EIS is a disclosure document that not only evaluates project alternatives, but should include an economic feasibility analysis to assure mitigation commitments are realistic. Enforcement is a mitigation feature and part of the NEPA evaluation in reducing project impacts. If the USFS is unable to implement effective enforcement of unauthorized motorized travel, this should be stated. In addition, the USFS should evaluate each alternative in the FEIS on USFS’s ability to protect natural resources. This would include enforcement under current and projected budget and resources.

Page SEIS 4-13, Dispersed recreation sites – Dispersed recreation is currently included in the “4.14.5 Cumulative Effects on Vegetation.” This activity should also be included in the *Cumulative, Effects for Soils*. It is EPA’s observations in the field that significant soil impacts can occur by off-road camping. These impacts can be amplified by the desire of the campers to camp near a water source (e.g. lake or stream) where soils and protective vegetation are easily impacted due to vehicles and human impacts.

Page SEIS 4-14, Conclusion: The SEIS states, in the conclusion paragraph for noxious weeds, that the USFS will initiate a noxious weed treatment and user education program in order to lessen the impacts on the natural environment. EPA would like to see the FEIS describe this program in more detail explaining its goal and expected outcomes along with commitments to support the program.

Cumulative Effects on Scenery, page SEIS 4-48: EPA believes that this section needs to be expanded to fully evaluate the cumulative impacts of the travel system on the scenery in the Ogden Ranger District. Currently the document concludes that the roads and trails provide a platform for people to observe the surrounding area. However, the roads themselves are an impact to the natural environment, which can significantly impact the aesthetics of the natural environment due to their location. Examples where road and trail placements can cause a scenery impacts are where they occur along stream channels, traverse an open meadow or switchback up an open slope.

4.14.10 Cumulative Effects on Roadless Areas, Areas of Consideration for Cumulative Effects, page SEIS - The SEIS states, "The Roadless areas on the Ogden Ranger District are largely undeveloped because of their remoteness, lack of resources, lack of interest and high cost of development." EPA believes that this statement is incorrect and misleading. Please refer to the Roadless Rule, Final rule and Record of Decision, Federal Register: January 12, 2001.

Purpose and Need for the Roadless Area Conservation Rule

"The Department of Agriculture is responsible for managing National Forest System resources to sustain the health, diversity, and productivity of the nation's forests and grasslands to meet the needs of present and future generations. As noted in the USDA Forest Service Strategic Plan (2000 Revision, October 2000), demands for, and supplies of, renewable resources change over time in response to social values, new technology, and new information. In the future, expanding urban areas and increased fragmentation of private lands make it likely that the largest and most extensive tracts of undeveloped land will be those in public ownership.

This final rule prohibits road construction, reconstruction, and timber harvest in inventoried roadless areas because they have the greatest likelihood of altering and fragmenting landscapes, resulting in immediate, long-term loss of roadless area values and characteristics. Although other activities may also compromise roadless area values, they resist analysis at the national level and are best reviewed through local land management planning. Additionally, the size of the existing forest road system and attendant budget constraints prevent the agency from managing its road system to the safety and environmental standards to which it was built. Finally, national concern over roadless area management continues to generate controversy, including costly and time-consuming appeals and litigation (FEIS Vol. 1, 1-16 to 1-17). This final rule addresses these needs in the context of a national rulemaking."